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August 18, 2023

VIA ECF

Honorable Paul G. Gardephe  
United States District Judge  
40 Foley Square, Room 2204  
New York, NY 10007

**Re:** 2BCom, LLC v. Curtis Int'l, Ltd.  
Civil Action No. 1:23-cv-03979-PGG

Dear Judge Gardephe:

Pursuant to Rule I. D. of Your Honor's Individual Practices, Defendant Curtis International Ltd. ("Curtis") and Plaintiff 2BCom, LLC ("2BCom") (collectively, "the Parties") respectfully submit this joint letter motion to the Court to request a thirty (30) day extension of time for Curtis to respond to Plaintiff's complaint (D.I. 1) and additional case deadlines. Pursuant to Rule I. E., the Parties respectfully request an adjournment of the initial pretrial conference, which is currently scheduled for August 31, 2023 at 12:00 p.m., including the submission of the Parties' joint pretrial conference letter, currently due August 24, 2023. (D.I. 7). As detailed below, the Parties are engaged in productive settlement discussions and jointly believe an extension to these dates would allow the parties to focus on those discussions.

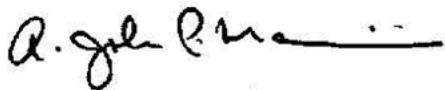
2BCom filed the complaint in this action on May 12, 2023. On May 24, 2023, Curtis agreed to accept service of the complaint pursuant to Fed. R. Civ. P. 4(d)(3), and 2BCom agreed to an extension of time for Curtis to respond to the complaint up to and including August 22, 2023. The Parties have been engaged in productive settlement negotiations in efforts to resolve this matter. In order to allow those discussions to continue and, potentially, resolve this litigation in its entirety, the Parties believe a thirty (30) day stay of all case deadlines would allow the Parties and the Court to preserve resources during these settlement discussions. In order to focus on the potential resolution of this matter and to avoid burdening the Court with unnecessary litigation, the Parties jointly seek: (i) an extension of time for Curtis to respond to the complaint from August 22, 2023 to September 21, 2023; (ii) an adjournment of the initial pretrial conference in this matter from August 31, 2023 to October 2, 2023, including the submission of the Parties' joint pretrial conference letter, or as soon as thereafter as this Court may be heard.

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This is the first request for an extension of time for Curtis to respond to the complaint, and the first request for adjournment of the initial pretrial conference. There are no other scheduled dates that will be affected by this request. Accordingly, the Parties respectfully request that the Court grant the extension of time for Curtis to respond to the complaint and the adjournment of the initial pretrial conference.

We thank the Court for its time and consideration.

Respectfully submitted,

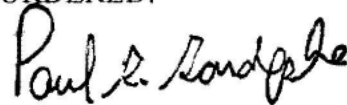


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*Attorney for Defendant Curtis International Ltd.*

**MEMO ENDORSED:** Defendant's response to the Complaint will be due by September 21, 2023. The conference scheduled for August 31, 2023 is adjourned to October 5, 2023 at 10:00 a.m.

SO ORDERED.



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Paul G. Gardephe  
United States District Judge

Dated: August 23, 2023